

COMMONWEALTH OF KENTUCKY  
PUBLIC SERVICE COMMISSION  
CASE NUMBER: 2004-00348

RECEIVED

DEC 10 2004

IN THE MATTER OF:

PUBLIC SERVICE  
COMMISSION

HOWARD KEEN

PLAINTIFF

vs.

CARROLL COUNTY WATER DISTRICT # 1

DEFENDANT

---

**MOTION TO CONDUCT DISCOVERY**

---

Now comes the Petitioner, Howard Keen, by and through counsel and pursuant to KRS § 13B.080 moves that the hearing officer issue an order to allow discovery and in support of the same states as follows:

1. The Defendant, Carroll County Water District # 1 is sole control of certain documents and information necessary to Plaintiff's position; and
2. The undersigned believes that discovery is necessary in order to provide the Plaintiff with the full opportunity to protect his rights.

Respectfully Submitted,



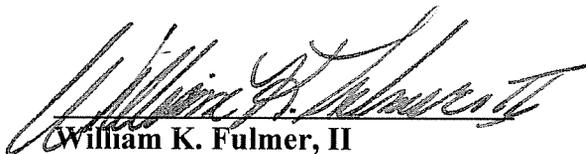
**William K. Fulmer, II**  
Attorney at Law (K.B.A. 84145)  
7289 Burlington Pike  
Florence, Kentucky 41042  
Phone: (859) 282-3500  
Facsimile: (859) 282-3212  
E-mail: wkfii@fuse.net

**CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing document has been served via the United States Postal Service, first-class, postage pre-paid to the following:

Hon. Ruth H. Baxter  
Crawford & Baxter, P.S.C.  
523 Highland Avenue  
P.O. Box 353  
Carrollton, Kentucky 41008

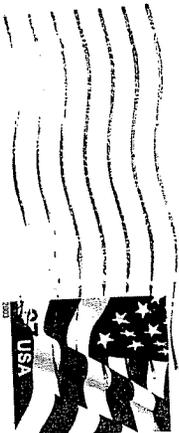
Date: 12/8/04



**William K. Fulmer, II**  
Attorney for Plaintiff

William K. Fulmer, II  
Attorney at Law  
7289 Burlington Pike  
Florence, Kentucky 41042

Public Service Commission of Kentucky  
P.O. Box 615  
211 Sower Boulevard  
Frankfort, Kentucky 40602-0615



**RECEIVED**

DEC 10 2004

PUBLIC SERVICE  
COMMISSION

40601+8234 13

